

Appln. Serial No. 10/791,414  
Amendment Dated November 9, 2007  
Reply to Office Action Mailed August 9, 2007

### REMARKS

In the Office Action dated August 9, 2007, claim 8 was rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter; and claims 1-19 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent Application Publication No. 2001/0009025 (Ahonen).

The § 101 rejection of claim 8 has been rendered moot by the cancellation of claim 8.

#### Claim 10

Claim 10 has been amended to recite a method for maintaining secure network connections comprising:

- duplicating, at a third network element, information associated with a secure network connection between a first network element and a second network element, wherein a lookup of security associations associated with the secure network connection is not dependent on any destination address; and
- in response to detecting failure of the second network element, replacing the second network element with the third network element in the secure network connection with the first network element.

With respect to the subject matter of claim 10, the Office Action cited ¶ [0094], lines 1-6, of Ahonen, which refers to the establishment of security associations between a mobile host and a firewall, and between the mobile host and a correspondent host. The cited passage also notes that the mobile host “may additionally establish SAs with a second (or subsequent) correspondent host.” However, establishing multiple security associations among the mobile host, firewall, and multiple correspondent hosts does not constitute **duplicating** (at a third network element) information associated with a secure network connection between a first network element and a second network element. In fact, it is clear that the security associations among different pairs of nodes established in Ahonen are **different** security associations. Therefore, this passage of Ahonen cannot satisfy the “duplicating” clause of claim 10.

Moreover, with respect to claim 10, Ahonen fails to disclose the following task: “in response to detecting failure of the second network element, replacing the second network element with the third network element in the secure network connection with the first network element.”

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In view of the foregoing, it is respectfully submitted that claim 10 is not anticipated by Ahonen.

Claim 12

Claim 12 recites a method for maintaining secure network connections, comprising:

- configuring a plurality of security gateways such that a lookup of security associations is not dependent on any destination address; and
- sharing at least one security association among the plurality of security gateways.

With respect to the "sharing" clause of claim 12, the Office Action cited ¶ [0035], lines 6-12, of Ahonen and referred to the rejection of claim 2. The cited ¶ [0035] passage refers to the access network coupling the mobile host to an Internet, and also refers to an alternative path for coupling the mobile host to an intranet that involves a core network. Moreover, the cited passage states that a secure connection between the mobile host and the correspondent host "is facilitated using 'daemons' which work inside the mobile host ...." Nowhere in this passage of Ahonen is there any hint of sharing at least one security association among the plurality of security gateways. Note that according to claim 12, plural security gateways share at least one security association, a feature that is clearly nowhere described in Ahonen.

The passage of Ahonen cited against claim 2 is ¶ [0012], which makes absolutely no mention of sharing a security association among plural security gateways.

Therefore, claim 12 is also not anticipated by Ahonen.

Claim 22

Note that independent claim 13 has been cancelled, without prejudice. Newly added independent claim 22 recites a first security server that comprises:

- a transceiver to receive information relating to at least one security association of a secure network connection between a mobile client and a second security server; and
- a processor module to:
  - monitor operation of the second security server;

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- in response to detecting failure of the second security server, send a message to the mobile client that the first security server is taking over the secure network connection; and
- communicate with the mobile client using the at least one security association over the secure network connection between the first security server and the mobile client.

Ahonen does not disclose a **first** security server receiving information relating to at least one security association of a secure network connection between a mobile client and a **second** security server, and being able to detect failure of the second security server and to send a message to the mobile client that the first security server is taking over the secure network connection.

Therefore, claim 22 is also allowable over Ahonen.

#### Claim 1

Claim 1 has been amended to recite that a secure message transmitted from a first network element to a second network element contains **both the old address and the new address** associated with the first network element. Ahonen does not disclose this feature. Paragraph [0111] of Ahonen refers to a mobile host sending a control authorization certificate to a firewall, where the control authorization certificate includes source and destination IP addresses. Note that the source and destination IP addresses can be non-changed addresses, or alternatively, if addresses have been changed, new source and destination IP addresses. *See Ahonen, ¶ [0113].* Ahonen clearly does not contemplate that both the old and new addresses are communicated in the control authorization certificate.

Therefore, Ahonen does not anticipate the subject matter of claim 1.

#### Conclusion

Dependent claims, including newly added dependent claims 20 and 21, are allowable for at least the same reasons as corresponding independent claims.

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Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (NRT.0124US).

Respectfully submitted,



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